

THE MYERS LAW GROUP  
Corporate . Intellectual Property . Litigation  
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Irvine, CA 92614

(address retyped due to illegibility)

May 16, 2018

**Via U.S. Mail**

Dr. Lawrence D. Wilson

**RE: Defamation of Purelife Enema Coffee**

Dr. Wilson:

This letter will serve to inform you that we represent Purelife Health Equipment LLC ("Purelife") with regard to its business and intellectual property matters.

As you know, Purelife has twice put you on notice regarding your defamatory statements through their October 8, 2017 and November 6, 2017 letters (attached hereto as Exhibit "A" and referred to herein as the "Letters"). While some of the defamatory statements have been removed from your website following our client's Letters, you have failed to fully comply with our client's demands. In fact, it is clear from your website <http://www.drlwilson.com>, that you have been, and continue to, publish false and defamatory statements about Purelife's products.

A few previously published and subsequently removed statements made by you stated as follows:

- "Warning: Do not use SA Wilson coffee or Purelife light roast coffee for enemas. They are too yin, which is toxic. Coffee should also be dry-looking, not oily."
- "Do not use SA Wilson enema or Purelife light roast coffee for enemas. They are too yin."
- "Avoid the Gerson coffee, Purelife Coffee and the SA Wilson enema coffee."
- "Do not use "enema" coffee from SA Wilson or Purelife. These are lighter roast coffees and are too yin."

Since you have not complied with the demands in the Letters and given your brazen actions following notices to you, we can only conclude that your actions are an intentional attempt to defame and harm our client. Our client is prepared to take action against you should you fail to stop all defaming and damaging actions against our client. In fact, your continued unlawful conduct and actions are of the nature that courts have found ripe for punitive damages in addition to traditional statutory and actual damages.

Evidence of such unlawful conduct we uncovered is a link on your website located at <http://www.drlwilson.com/ARTICLES/COFFEE%20ENEMA.HTM>. When a consumer clicks on that link, they are directed to a webpage entitled "COFFEE ENEMAS." At the top of that webpage is a warning that contains defamatory statements made by you that are directed at Purelife's products, business, and reputation, which states:

*“Warnings:*

....

2. For development, we do not recommend “enema coffee” from Purelife or SA Wilson. It is too yin and products that are more yin tend to slow or stop development.”

Further evidence of such unlawful conduct we uncovered can also be found on the following link: <https://www.humandevelopmenttodayandbeyond.com/coffee-enema-detox>, where there is a published article written by you titled “Coffee Enema Detoxification Procedure.” The following defamatory statements were made in your article, which are directed at Purelife’s products, business, and reputation:

- (1) Chapter 2, under the section “The Best Coffee for Enemas”, you state: “Avoid the Gerson coffee, Purelife Coffee and the SA Wilson enema coffee. They are quite stimulating and not working as well.”
- (2) Chapter 5, under the section “Safety First,” you state: “1. Do not use SA Wilson enema coffee or Purelife coffee for enemas. They are too yin.”

(Attached hereto as Exhibit “B”).

While your currently published comments are a bit vague, that very ambiguity is problematic and actionable. Specifically, the phrases that Purelife’s products “tend to slow or stop development” and “are quite stimulating and not working as well” suggests that Purelife’s products are hazardous to one’s health and otherwise dangerous to use. These statements as made are not substantiated and also seemingly intended to refer to all of Purelife’s enema coffee products when other statements made on your website suggest that your statements are in relation to light roast products. We also do not find any attempt by you on your website or otherwise to support your allegations by way of evidence or data. Rather it appears to be unfounded, dangerous, and defamatory. Given your training and profession, you assuredly understand that unsupported opinions alleging that products are dangerous is reckless.

Ultimately, your actions against our client subject you to the following claims and/or is in direct violation of state and federal laws, which include, but are not limited to, the following:

1. Trade Libel;
2. Tortious Interference with Business Relations;
3. Tortious Interference with Prospective Business Relations;
4. 15 U.S.C. § 1125(a) of the Lanham (Trademark) Act (any false or misleading descriptions/representations of another’s products by any person shall be liable in a civil action).
5. *California Business & Professions Code § 17500 et seq.* (false advertising allows for the disgorgement of profits and punitive damages for willful conduct).

Your unlawful actions have caused, and will continue to cause, Purelife significant reputational and economical harm. Accordingly, it is Purelife’s intent to take any and all action necessary to enforce its rights and protect itself from further damage. Therefore, we hereby insist upon immediate and full compliance with the following demands:

1. Immediately cease and desist any and all further publication of false and defamatory statements concerning Purelife, including the removal of the brand name "Purelife" from your "COFFEE ENEMAS" webpage and any other reference to "Purelife" that may be located on additional webpages throughout <http://www.drwilson.com>, <https://www.humandevopmenttodayandbeyond.com/coffee-enema-detox>, and/or any other platforms that carry information or articles written by you that include false and defamatory statements concerning Purelife;
2. Immediately cease and desist any and all further use of our client's trademark (more specifically the word "PURELIFE");
3. Provide the exact date when the "COFFEE ENEMAS" webpage was first posted on your website and the total number of monthly visits received by your website <http://www.drwilson.com> from the date when the "COFFEE ENEMAS" webpage was first posted on your website to the present, both of which will be used to assess damages that are owed to Purelife;
4. Provide the exact date when your article "Coffee Enema Detoxification Procedure" was published on the website <https://www.humandevopmenttodayandbeyond.com/coffee-enema-detox> and the total number of monthly visits received by such website, both of which will be used to assess damages that are owed to Purelife;
5. Identify any and all other statements or publications made by you that mention, refer to, or otherwise pertain to Purelife, including the time, date, and location (including websites) of such statements or publications;
6. Identify the names and addresses of any third parties who are otherwise involved with or affiliated with your website or other statements or publications regarding Purelife;
7. Identify the names, addresses, links, and details of any third party platforms that carry information or articles written by you that include false and defamatory statements concerning Purelife and
8. Confirm, in writing to us, by 5:00 p.m. Pacific Daylight Time on **Wednesday, May 23, 2018** that you shall fully comply and promptly comply with each of our demands.

In light of the foregoing, we demand that you preserve any such evidence within your custody and control and notify all employees and/or agents who may have such evidence in their possession of this request, as it may be necessary for Purelife to request such evidence through discovery requests in the future. You and your employees and/or agents are required to take the following steps to protect and preserve any of that information that is in your possession or under your control until further notice. Specifically, you and your employees and/or agents, will need to do the following immediately:

1. Suspend deletion, overwriting, or any other destruction of information relevant to this dispute that is under yours and your employees' and/or agents' control. This includes information wherever it is stored, whether at work stations, on a laptop, or at homes. It includes all forms of electronic communication, including e-mail, work orders, specification agreements, sales agreements, word processing, calendars, voice messages, videos, and photographs. This information must be preserved so that it can be retrieved at a later time. The information must be preserved in its original electronic form, so that all information contained within it, whether visible or not, is also available for inspection, it is not sufficient to make a hard copy of electronic communication. You and your employees and/or agents are responsible for the information that is under yours and your employees' and/or agents' control.

Letter to Dr. Wilson

May 16, 2018

Page | 4

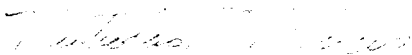
2. Similarly, preserve any new information that is generated after your receipt of this letter that is relevant to this dispute.

This is an important legal duty and failure to follow these instructions may subject you and your employees and/or agents to discipline by a court of law, as the failure to preserve this information has very serious consequences.

Should you fail to comply with our demands by **Wednesday, May 23, 2018**, we shall recommend, without further notice to you that our client take all available legal action to protect its rights.

Finally, be advised that nothing contained in this letter is intended as, or may be deemed to constitute, a waiver of any of our client's rights or remedies, all of which are expressly reserved. This communication is subject to Federal Rule of Evidence 408 and California Evidence Code §§ 1152 and 1154, and any of their state or common law equivalents.

Most sincerely,  
THE MYERS LAW GROUP



Nicholas D. Myers